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## S M I T H | V I L L A Z O R

October 18, 2021

### **VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Hayes, et al., No. 20 Cr. 500**

Dear Judge Koeltl:

We represent Defendant Benjamin Delo in the above-referenced matter. We respectfully submit this letter to request modification of Mr. Delo's conditions of pre-trial release for an upcoming trip to the United States from October 22, 2021 to November 4, 2021. While in the United States, Mr. Delo requests that the Court extend the areas in which he is permitted to travel to include the Southern and Central Districts of Florida as well as permit Mr. Delo to retain possession of his British passport during his trip, the surrender of which would otherwise be required by his bail conditions while he is in the United States. Should the court grant Mr. Delo's request, he plans to:

- (i) travel to Fort Lauderdale, Florida from Bermuda on October 22, 2021;
- (ii) travel to New York, New York from Fort Lauderdale, Florida on October 28, 2021;
- (iii) travel from New York, New York to Fort Lauderdale, Florida on November 1, 2021; and
- (iv) travel to the United Kingdom on November 4, 2021.

The government defers to Pretrial Services, which has no objection to these requests.

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Respectfully submitted,

/s/ Patrick J. Smith

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cc: AUSA Samuel Raymond (via ECF)  
AUSA Jessica Greenwood (via ECF)  
USPT Karina Vilefort (via Email)  
USPT Dennis Khilkevich (via Email)